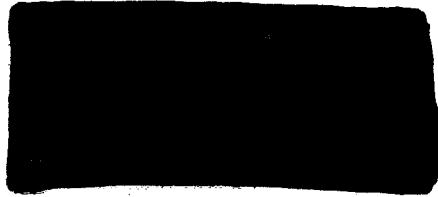


47 Coffin Street Ratepayer Advocates  
47 Coffin Street  
West Newbury, Massachusetts 01985  
October 30, 2015



Re: *Executive Order 562, the Department of Energy Resources (DOER) Listening Sessions to provide the public with the opportunity to hear about the agency's regulatory reform efforts and to offer feedback on all DOER regulations*

Dear Mr. Barletta:

Thank you for the opportunity to participate provided in the above-captioned matter. On behalf of 47 Coffin Street Ratepayer Advocates, I have submitted timely comments through your on-line portal.

Included herewith is a hard copy of those comments.

Thank you for your attention; please feel free to contact me with any questions.

Respectfully submitted,

A handwritten signature in cursive script that reads "Elisa J. Grammer".

Elisa J. Grammer

47 Coffin Street Ratepayer Advocates

*cc by email:*

Honorable Lenny Mirra, State Representative

Rick Parker, West Newbury Energy Committee

## QUALIFICATIONS AND INTEREST

47 Coffin comprises senior citizen, mostly retired, retail electric ratepayers residing at 47 Coffin Street, West Newbury, Massachusetts. As National Grid ratepayers 47 Coffin is directly affected by DOER/DPU policies. Further, thanks to propane-fired behind-the-meter standby generation, 47 Coffin is in a position to provide demand response services that could help mitigate high prices resulting from uncontrolled coincident peak demand. Additionally, 47 Coffin has invested in rooftop solar and an electric vehicle, both of which could, if the regulatory regime permitted, provide enhanced services to the grid.

Starting in the 1970s, 47 Coffin members have worked as lawyers and/or as a scientist at the U.S. Department of Energy, Nuclear Regulatory Commission, Federal Energy Regulatory Commission, Environmental Protection Agency and Government Accountability Office. They have also worked in private practice representing clients ranging from oil and gas producers and pipelines to the San Diego Air Pollution Control District in federal and state forums.

Having served as Washington, D.C., counsel to the California agency charged with managing that state's energy crisis of 2000-2001, counsel for 47 Coffin has extensive experience with and interest in state efforts such to address alarming wholesale electric rate increases. Counsel for 47 Coffin Street further represented the California Department of Water Resources State Water Project, perhaps the nation's largest single provider of wholesale, generation-quality demand response and has extensive experience with and interest in demand response (particularly verifiable, dispatchable load drop or load increases and related Ancillary Services).

**POSITION: TO COMPLY WITH GOVERNING MANDATES, DOER & DPU SHOULD IMMEDIATELY TAKE ACTION TO PROMOTE RETAIL ELECTRIC DEMAND RESPONSE, PARTICULARLY INCLUDING DIRECT LOAD CONTROL**

While Massachusetts is to be commended for its leadership in generalized energy efficiency, both US Department of Energy (<http://www.eia.gov/electricity/data/eia861/zip/f8612014.zip>) and Federal Energy Regulatory Commission (<http://www.ferc.gov/legal/staff-reports/12-20-12-demand-response.pdf>) reports show the Commonwealth at or near the bottom in terms of demand response programs, particularly direct load control long effected by such rudimentary technology as radio controlled utility dispatch/cycling of hot water heaters, air conditioners, strip heaters and other devices.

This situation is urgent: unless defenders of wholesale demand response programs like those provided by the New England Independent System Operator can convince the Supreme Court to overturn a decision vacating FERC's wholesale demand response program, Massachusetts will have no current, viable demand response except for various efforts of municipal utilities and pilot programs, principally offered by National Grid in Worcester. It is indeed startling that DOER, which in its own view has expansive responsibility to "ensure that utility consumers are provided with the most reliable service at the lowest possible cost"

(<http://web1.env.state.ma.us/DPU/FileRoomAPI/api/Attachments/Get/?path=15->

37%2fDOER Reply Comments 070615.pdf, citing M.G.L. Ch. 164 § 76) apparently has no “Plan B” to replace wholesale demand response programs with state-run retail programs.

Credible studies indicate that electric demand response can provide Massachusetts utility customers more than a 3:1 benefit over cost, including relief from stunning capacity cost increases (<http://info.aee.net/hubfs/PDF/aee-peak-demand-reduction-strategy.pdf?t=1445022229466>) and National Grid has reported impressive savings from its demand response pilot program in Worcester (<http://www.utilitydive.com/news/national-grid-demand-response-pilot-nets-participants-20-energy-savings/407145/>). Yet 47 Coffin has seen no indication that DOER has made a comparable analysis or is taking meaningful action to support additional retail demand response, aside from eventual implementation of time-sensitive energy rates.

Lack of strong retail, state-based leadership in demand response is consistent neither with the mandate to “ensure that utility consumers are provided with the most reliable service at the lowest possible cost” nor with the Commonwealth’s greenhouse gas objectives. Moreover, demand response in the form of direct load control provides unique reliability benefits. Continuing to forgo significant savings and reliability enhancements cannot be reconciled with DOER’s core mission—and is particularly inexplicable in view of the reasonable possibility that the Supreme Court will not rescue wholesale demand response programs.

RELIEF SOUGHT: IMMEDIATE USE OF EXISTING MODELS TO DEVELOP RETAIL  
DEMAND RESPONSE IN MASSACHUSETTS

47 Coffin respectfully requests that DOER, working with DPU, begin immediately to:

- Use the analyses cited above or urgently build on them to develop an analytical base for demand response in Massachusetts
- Rapidly evaluate and develop tariff provisions (e.g., [https://www.bge.com/myaccount/billsrates/rates/tariffs/electricservice/electric%20services%20rates%20and%20tariffs/rdr\\_15.pdf](https://www.bge.com/myaccount/billsrates/rates/tariffs/electricservice/electric%20services%20rates%20and%20tariffs/rdr_15.pdf)) offering customers an option to participate in direct load control—which has been done elsewhere quickly and cheaply with radio controls or wifi, not necessarily requiring smart meter roll out
- Continue to pursue accurate price signals to promote demand response, including not merely time-sensitive volumetric rates for energy costs, but also demand or fixed charges based on coincident peak usage (also known as load ratio share) to recover capacity-related costs

Thank you for your consideration of these urgent matters.

Respectfully submitted,



Elisa J Grammer, 47 Coffin St. Ratepayer Advocates